

Neel Chatterjee (SBN 173985)
nchatterjee@goodwinlaw.com

James Lin (SBN 310440)
jlin@goodwinlaw.com

GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, California 94025
Tel.: +1 650 752 3100
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)
bschuman@goodwinlaw.com

Shane Brun (SBN 179079)
sbrun@goodwinlaw.com

Rachel M. Walsh (SBN 250568)
rwalsh@goodwinlaw.com

Hayes P. Hyde (SBN 308031)
hhyde@goodwinlaw.com

GOODWIN PROCTER LLP
Three Embarcadero Center
San Francisco, California 94111
Tel.: +1 415 733 6000
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)
hvu@goodwinlaw.com

GOODWIN PROCTER LLP
601 S. Figueroa Street, 41st Floor
Los Angeles, California 90017
Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

Attorneys for Defendant: Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC;
Otto Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**[PROPOSED] ORDER GRANTING MOTION
IN LIMINE TO EXCLUDE REPORT AND
TESTIMONY OF DR. LAMBERTUS
HESSELINK**

Trial: December 4, 2017,
Courtroom: 8 (19th Floor)
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Motion in Limine to Exclude Testimony; and
2. Declaration of James Lin

[PROPOSED] ORDER

This matter comes before the Court on Defendant Otto Trucking, LLC's ("Otto Trucking") Motion to Exclude Report and Testimony of Dr. Lambertus Hesselink (the "Motion"). Having considered the arguments and evidence submitted and for good cause appearing:

IT IS HEREBY ORDERED THAT Otto Trucking's Motion is GRANTED. Dr. Hesselink's opinion regarding Otto Trucking's liability based on theories of trade secret misappropriation, and any testimony based thereon is hereby excluded.

IT IS SO ORDERED.

Dated: _____, 2017

HON. WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 17, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system. I certify under penalty of perjury that the foregoing is true and correct. Executed on **October 17, 2017**.

/s/ Neel Chatterjee

NEEL CHATTERJEE